EXHIBIT A

11/30/2020

Skip to Main Content Logout My Account Search Menu New Civil Search Refine Search Back

Location : Justice Court Help

REGISTER OF ACTIONS

CASE No. 20C019817

LUBA GONZALEZ, AKA Luba Snow, Plaintiff(s) vs. TRANSUNION LLC,

Defendant(s)

§ § § š

Case Type: Civil - Debt Collection Agency

Date Filed: 10/28/2020 Location: JC Department 4

PARTY INFORMATION

Lead Attorneys

LLC, TRANSUNION Defendant

Defendant TRANSUNION LLC

Plaintiff GONZALEZ, LUBA AKA Snow, Luba Pro Se

EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS

10/28/2020 Start Time Tracking: JCRCP 41(e) - 2 years

Start Time Tracking: JCRCP 41(e) - 5 years 10/28/2020

Start Time Tracking: JCRCP 4(i) 10/28/2020

10/28/2020 Civil Complaint - \$5,000.01 to \$10,000.00

COMPLAINT SNOW V TU

10/28/2020 Application to Proceed in Forma Pauperis - Fee Waiver Req

FEE WAIVER

Documents in Support 10/28/2020

EXHIBIT APPENDIX FOR SNOW V TRANSUNION

10/28/2020 Order to Proceed In Forma Pauperis Granted

10/28/2020 Civil Summons Issued (Efiling)

10/28/2020 Amended Certificate of Mailing

AMENDED CERTIFICATE OF MAILING FOR TRANSUNION COMPLAINT

FINANCIAL INFORMATION

Plaintiff GONZALEZ, LUBA

Total Financial Assessment

Total Payments and Credits

199.00 199.00

Balance Due as of 11/30/2020

0.00

10/28/2020 10/28/2020 **Transaction Assessment** 199.00 Fee Waiver

(199.00)

Case 2:20-cv-02181-JCM-DJA Document 1-1 Filed 11/30/20 Page 3 of 28

Las Vegas Justice Court Electronically Filed 10/28/2020 12:00 AM Suzan Baucum CLERK OF THE COURT

Las Vegas Justice Court Clark County, Nevada

Case No. 20C019817 Dept.

Department #: LVJC 4

LUBA GONZALEZ aka Luba Snow,

Plaintiff,

TRANSUNION LLC,

Defendant.

Complaint

Luba Snow (formerly Gonzalez) sues Transunion LLC for money damages under the Fair Credit Reporting Act section 616 and 617 and says:

Jurisdictional Allegations

- 1. This is an action for money damages of \$9,750.00 US Dollars.
- 2. At all times material to this lawsuit Luba Snow lived in Clark County, Nevada.
- 3. At all times pertinent to this lawsuit Transunion LLC did commerce in Clark County, Nevada.
- 4. All acts necessary or precedent to the bringing of this lawsuit occurred or accrued in Clark County, Nevada.
- 5. This court has jurisdiction.

General Factual Allegations

- 6. On 03 September 2020 Luba sent her fourth and final written notice to Transunion before seeking litigation.
- 7. Luba is seeking relief because of the 14 unknown/unverified accounts still on her credit report.
- 8. The following 13 accounts are in violation of section 611(a)(7) & 611(5)(A) of the FCRA and 15 U.S.C. §1681:

A. TD BANK USA/TARGET CREDI #585975210377...

B. CAPITAL ONE BANK USA NA #517805891332...

C. CHASE AUTO FINANCE #1137...

D. COMENITY BANK/VCTRSEC #585637513683...

E. WELLS FARGO CARD SERVICE #446542059002...

F. WF/AMERICAN GEM SOCIET #577442114090...

G. ACCOUNT CORP OF SOUTHERN #D1846...

Case Number: 20C019817

| H. RC WILLEY | #215511 |
|------------------------------|---------------|
| I. CALVALRY PORTFOLIO SERVIC | #21695782 |
| J. EOS CCA | #88025 |
| K. JPMCB AUTO | #1170391733 |
| L. JPMCB AUTO | #1192471850 |
| M. PORTFOLIO RECOVERY | #681921006124 |
| N. CONNS | #55105 |

9. In accordance with the FCRA, Luba would like the preceding items removed from her credit report in addition to the following unknown hard inquires:

| O. COAF | 04 September 2020 |
|-----------------|-------------------|
| P. AMERICREDIT | 04 September 2020 |
| Q. CARDINALEWAY | 04 September 2020 |
| R. ALLY FINAN I | 04 September 2020 |

Wherefore Luba Snow demands judgement for money damages in the amount of \$9,7500.00 US Dollars against Transunion LLC together with other such and further relief as the court may deem reasonable and just under the circumstances.

Luba Snow(formerly Gonzalez) 7260 Sunny Countryside Ave Las Vegas; NV 89179

Certificate of Service

Under penalty of perjury, I certify that a copy of the foregoing was provided by the Office of the Ex-Officio Constable - Las Vegas Township to TRANS UNION LLC THE PRENTICE-HALL CORPORATION SYSTEM, INC. 251 LITTLE FALLS DRIVE WILMINGTON, DE 19808 no later than 13 November 2020.

Luba Snow (formerly Gonzalez) 7260 Sunny Countryside Ave-Las Vegas, NV 89179 Las Vegas Justice Court Clark County, Nevada

> Case No.20C0198/7 Dept. No.: 04

LUBA GONZALEZ aka Luba Snow, Plaintiff,

v. TRANSUNION LLC, Defendant.

Certificate of Mailing

The undersigned certifies, under penalty of perjury, that on 29 October 2020, copies of the foregoing complaint were mailed to Transunion LLC The Prentice-Hall Corporation System, Inc. 251 Little Falls Drive Wilmington, DE 19808 by certified mail.

28 October 2020

Luba Snow (formerly Gonzalez)
7260 Sunny Countryside Ave

Las Vegas NV, 89179

Case 2:20-cv-02181-JCM-DJA Document 1-1 Filed 11/30/20 Page 6 of 28 Las Vegas Justice Court

Las Vegas Justice Court
Electronically Filed
10/28/2020 12:00 AM
Suzan Baucum
CLERK OF THE COURT

Las Vegas Justice Court Clark County, Nevada

Case No. 20C019817
Dept.
Department #: LVJC 4

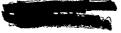
LUBA GONZALEZ aka Luba Snow,
Plaintiff,
v.
TRANSUNION LLC,
Defendant.

Exhibit Appendix to Transunion Complaint

A. Documents - 4 Letters from Luba to Transunion

Case Number: 20C019817

Exhibit A



TRANSUNION PO BOX 2000 CHESTER PA 19022

4/3/2020

This letter is my formal written request for you to investigate the following unverified accounts listed below: According to the Fair Credit Reporting Act, 15 U.S.C. 1681 your company is required by law to verify - through the physical verification of the signed consumer contract - any and all accounts you post on a credit report to assure maximum accuracy. Without proper verification by your company, anyone paying for reporting services could fax, mail, or e-mail in a fraudulent account.

I demand to see a copy of the Verifiable Proof, an original consumer contract with my signature on it, that you used to verify that the account belonged to the credit report named: LUBA GONZALEZ. Your failure to properly verify these accounts has hurt my ability to obtain credit for my business. Under the FCRA 15 U.S.C. 1681, unverified accounts must be promptly deleted. If you are unable to provide me with a copy of the verifiable proof that you have on file within 30(thirty) days for each account listed below then you must remove these accounts from the credit report. Please provide me with a copy of an updated and corrected credit report showing these items removed.

I demand the following accounts be verified or removed immediately

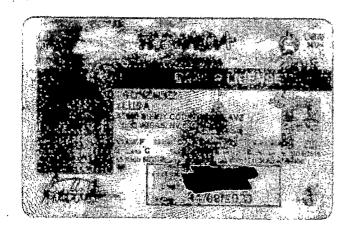
*Please also remove all non-account holding inquiries over thirty(30) days old.

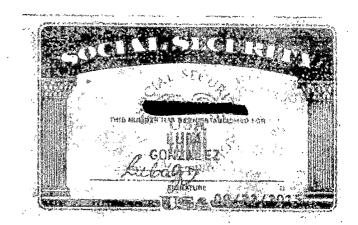
| Account Name | | Physical Proof of Verification |
|-------------------------|--------------|--------------------------------|
| - Capital Due Bank USA | , | Unkerted become |
| - Chare Ato Finance | 1137 | Undierified account |
| - Comenity Bank Midon | 585637513683 | Once of el account |
| - SYNCB9 Home Besign | 603461008106 | |
| - SYNCB/TJX COPLAC | | Unverted accord |
| S YNCB/TOYSRUS | 604586100848 | Universal account |
| - Wells Fargo (and Sucs | 446542059002 | . Unnerified according |
| 1 Amin V | 55105 | (continued) |

LUBA GONZALEZ

Thank You

they can Hold LLEOZSLLSSS ON weether account MC MICEX ... (1.5.5) Un worther hears filmy had aM. "726 LS8 1) N word had accom Milland tunding 646 L58 一かしりろう (ハイカタンへり - EN 10 long fragin 1. 1686 LSQ whenhy become s/2001 SUSQ-1603 30 h (5500) Unuerilay) quana 0604162446 Cmoon 6/04/100/ 20 Cmoon 0/04/1991 -- Whosh JAMWO h21000/26/00) JAM We This account Buston or Sommitusch The man with the Provide Physical Proof of Verification





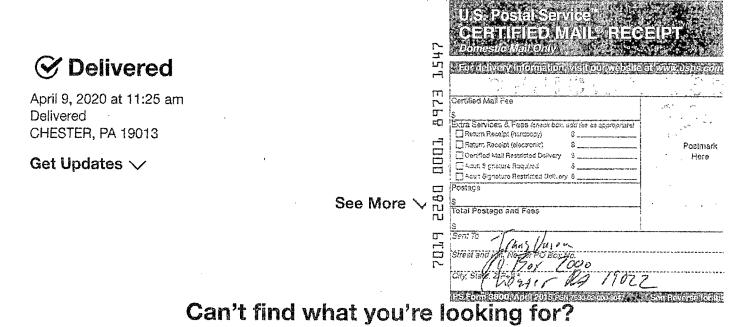
FAQs >

Track Another Package +

Tracking Number: 70192280000189731547

Remove >

Your item was delivered at 11:25 am on April 9, 2020 in CHESTER, PA 19013.



Go to our FAQs section to find answers to your tracking questions.



TRANSUNION PO BOX 2000 CHESTER PA 19022

Please be advised that this is my second written request for you to remove the unverified accounts listed below that remain on my credit report in violation of 15 USC statue 1681. You are required under the FCRA to have properly verified that an account listed on my credit report is mine by having a copy of the original credit application on file. In the results of your first re-investigation, you stated in writing that you verified that these items are being reported correctly. Who in your company verified these accounts? How did they verify them? Please provide me with the name of the individual, business address, and telephone number of the person or business contacted during your re-investigation. Also, tell me why you didn't send me copies of the verification like I asked you to?

As I am sure that you are well aware , current case law states that, Consumer Reporting Agencies bear grave responsibilities to ensure the accuracy of the accounts they report on and their responsibility must consist of something more than merely parroting information received from other sources. The courts have ordered that a re-investigation that merely shifts the burden back to the consumer and the credit grantor cannot fulfill the obligations imposed by statute 1681 a 4.

You have not provided me a copy of any original documentation that you have on file that is required under section 609 and 611 a 1 A, a consumer contract with my name on it, and under section 611 5 a of the FCRA - you are required to promptly delete all information which cannot be verified.

The law is very clear as to the civil liability and the remedy available to me negligent non-compliance, section 617, if you fall to comply with this federal law. I am a litigious consumer and fully intend on pursuing litigation in the matter to enforce my rights under the FCRA. I demand the following accounts be verified or deleted immediately.

Name of account

TO BONK UP TO HABY 5859752/0377... Not verification

TO BONK UP TO HABY SOT 865 89 1332... NOT VERIFIED

CHASE AUTO EINBUCE 1137... NOT VERIFIED

COMENTY BANK WISE \$35637513683... NOT VERIFIED

PORTPOLIO RECOVERY GO1921006124... NOT VERFER

TONS... NOT VERIFIED

TONS... NOT VERIFIED

Luauk you

ons opprod homes ZSCSS6M2 57155 ··· 25\$16h2411 ON DIMIL C & 2/65PL11 2104 SIDMAL ~ oh81d M MABATOOR GALOSPACE eboh 112 bhils

. 615 on SC6525

... 12/1 John W. Walley

のよりのいろ h21900128109 SHAR AUTO FINANCE LUZNOTAY MINOLIYAND

MAY WOLVERION UEW

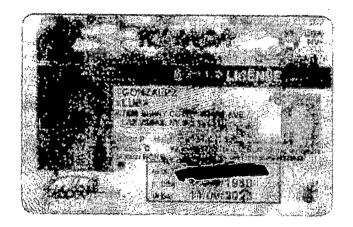
L20010074

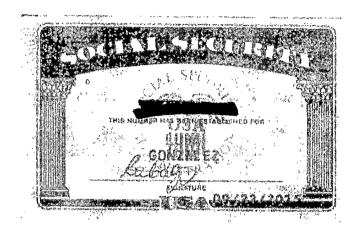
JABA A

Name of Account

Provide physical proof of vernication

Account Number





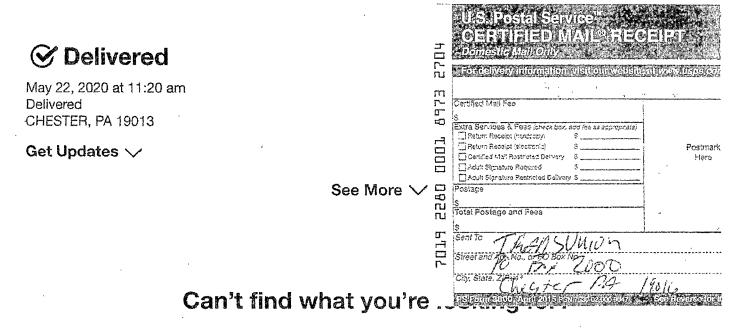
FAQs >

Track Another Package +

Tracking Number: 70192280000189732704

Remove >

Your item was delivered at 11:20 am on May 22, 2020 in CHESTER, PA 19013.



Go to our FAQs section to find answers to your tracking questions.

TRANSUNION PO BOX 2000 CHESTER PA 19016

Certified Mail: 7019 2280 0001 8972 9469

Re: Third Written Request

Please be advised that this is my third written request and final warning that I fully intend to pursue litigation in accordance with the FCRA to enforce my rights and seek relief and recover all monetary damages that I may be entitled to under section 616 and section 617 regarding your continued willful and negligent non compliance.

Despite two written requests, the unverified items listed below still remain on the credit file named, LUBA GONZALEZ, in violation of federal law. You are required under the FCRA to have properly verified that an account listed on a credit file belongs to that particular credit file by having a copy of the original credit application on file. In the results of your first investigation and subsequent re-investigation, you stated in writing that you verified that these accounts are being reported correctly. Who in your company verified these accounts belong to the account named LUBA GONZALEZ? How did you verify them? You still have not provided me with the name of the individual, business address and telephone number of the person or business contacted during your re-investigation. You have not provided me with a copy of any documentation, (a credit application with my signature on it) as required under section 609 & section 611(a)(1)(A). Furthermore, you have failed to provide me the method of verification as required under section 609 and section 611(a)(7). Please be advised that under section 611(5)(A) of the FCRA - you are required to promptly delete all information which cannot be verified.

The law is very clear as to the civil liability and the remedy available to me (section 616 & 617) if you fail to comply with federal law. I am a litigious consumer and fully intend on pursuing litigation in this matter to enforce my rights under the FCRA.

I demand that you send me copies of the documents you used to verify the following accounts listed below or you delete them immediately. Please provide me with a copy of an updated and corrected credit report showing that these items have been deleted.

Please delete all non-account holding inquiries over thirty days old.

Name of Account

Account Number

Provide physical proof of verification

COMENITY BANK

585637513683...

unventry

WELLS FARGO GAMD

446542059007 ...

517805871337

un vented

(AMTALONE

55104

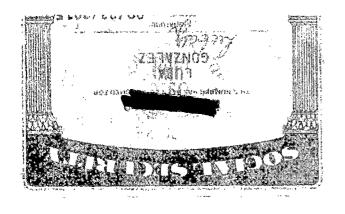
meritid

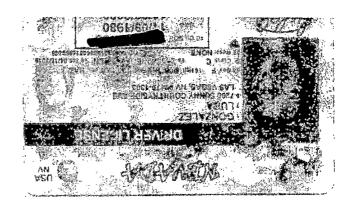
(OUNS

Vivelle

| Name of Account | Account Number Pr | ovide physical proof of verification |
|-------------------------|-------------------|--------------------------------------|
| CAPITAL ONE BANK USA | 517805 891337 | unerth.d |
| CHVISTE AND FINANCIE | (197 | en wer fred |
| COMENITY BANK | 585637513 \$83 | un werden |
| PORTFOLIOR ECONERY | 601921006124 | in certail |
| ILC WILLEY | 215511 | un wind m |
| WELLS RAPICIO DEPUBL | 44654205 9002 | Chalenand |
| WE/AMERICAN GEM | 577442114090 | and Conservation |
| ACCITC ON P OF SOUTHERN | D1846 | Unwither |
| 6.67 CCA | . 55165 | in with |
| Trincis aro | 119747 556 | |
| March 200 | 1176391733 | |
| (alvery Portholio SUL | 21698752- | - in while |
| (| | No. 19 Common of the second |
| Thank You | | |
| | | |

LUBA GONZALEZ





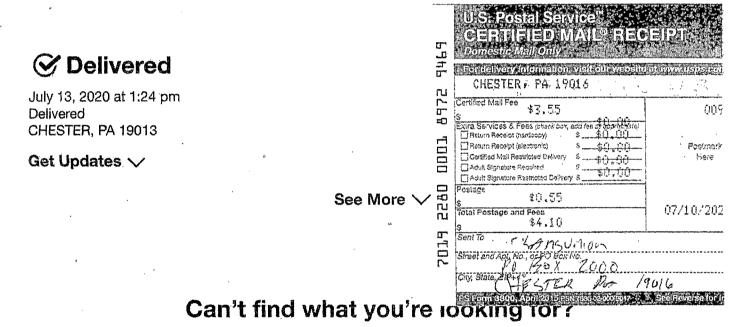
FAQs >

Track Another Package +

Tracking Number: 70192280000189729469

Remove >

Your item was delivered at 1:24 pm on July 13, 2020 in CHESTER, PA 19013.



Go to our FAQs section to find answers to your tracking questions.

TRANSUNION PO BOX 2000 CHESTER PA 19016

08.19.2020

Notice of Pending Litigation Seeking Relief and Monetary Damages Under FCRA Section 616 & Section 617

Please accept this final written offer of settlement before litigation as my attempt to amicably resolve your continued violation of the Fair Credit Reporting Act regarding your refusal to delete all of the unverified account information from the consumer file.

Your failure to provide me with verifiable proof required to post the accounts listed below proves that it does not exist and is therefore unverified. I intend to pursue litigation in accordance with the FCRA to seek relief and recover all monetary damages that I may be entitled to under Section 616 and Section 617 if the unverified items listed below are not deleted within 10 days. A copy of this letter as well as copies of the three written letters sent to you previously will also become part of the formal complaint to the Federal Trade Commission and also shall be used as evidence in pending litigation provided you fail to comply with this offer of settlement.

Despite my three written requests, the unverified items listed below still remain on the credit report named, LUBA GONZALEZ, in violation of federal law. In the results of your investigations, you stated in writing that verified these items are being reported correctly; Who verified these accounts? How did they verify them? You still have not provided me with the name of the individual, business address, and telephone number of the person or business contacted during your re-investigation. You have not provided me a copy of any original documentation. Furthermore, you have failed to provide the method of verification as required under section 611(a)(7). Please be advised that under Section 611 (5)(A) of the FCRA - you are required to promptly delete all information which cannot be verified.

The Law is very clear as to the Civil liability and the remedy available to me (Section 616 & 617) if you fail to comply with Federal Law. I am a litigious consumer and I fully intend on pursuing litigation in this matter to enforce my rights under the FCRA.

In order to avoid legal action, I demand that you send me copies of the documents you used to verify the following accounts listed below or you delete them immediately. Please provide me with a copy of an updated and corrected credit report showing that these items have been deleted.

Also I am instructing you to delete all non-account holding inquiries over thirty(30) days old.

Name of Account

'Account Number

595975010377

Provide physical proof of verification

TD BANK USA

55105

VN WAGE

Name of account

WELLSEARCO (ARDOVC 446547059002. 18- 10/16.

WRIAMERICAN GENSOU 577447114090

ACCITCORP OF SOUTHBAN W DISYLO.

THE WILLEY

7155))...

(ALVARY SORTHOLD SU 21995782

EUS CCA

TOMB 20

TIMES AM

... 55105 ---

119 247 1850

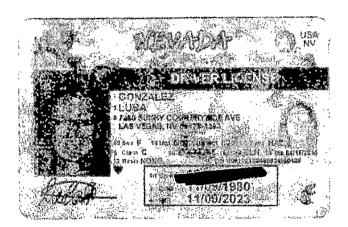
1170391793

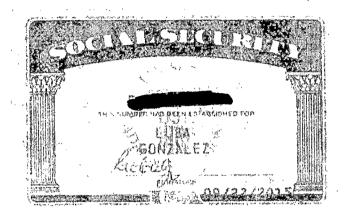
not writing nos unfiel

me worked

Holler vernoue all non-account holding

Thank you





FAQs >

Track Another Package +

Tracking Number: 70201290000197571599

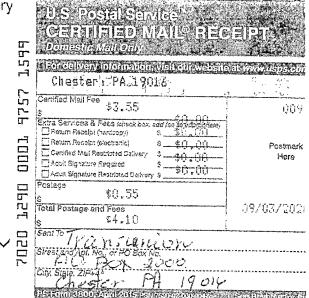
Remove >

Your item has been delivered to an agent for final delivery 2020 at 2:11 pm.

⊘ Delivered to Agent

September 9, 2020 at 2:11 pm Delivered to Agent for Final Delivery CHESTER, PA 19013

Get Updates ✓



Can't find what you're looking for?

See More

Go to our FAQs section to find answers to your tracking questions.

TRANSUNION PO BOX 2000 CHESTER PA 19016

08.19.2020

Notice of Pending Litigation Seeking Relief and Monetary Damages Under FCRA Section 616 & Section 617

Please accept this final written offer of settlement before litigation as my attempt to amicably resolve your continued violation of the Fair Credit Reporting Act regarding your refusal to delete all of the unverified account information from the consumer file.

Your failure to provide me with verifiable proof required to post the accounts listed below proves that it does not exist and is therefore unverified. I intend to pursue litigation in accordance with the FCRA to seek relief and recover all monetary damages that I may be entitled to under Section 616 and Section 617 if the unverified items listed below are not deleted within 10 days. A copy of this letter as well as copies of the three written letters sent to you previously will also become part of the formal complaint to the Federal Trade Commission and also shall be used as evidence in pending litigation provided you fall to comply with this offer of settlement.

Despite my three written requests, the unverified items listed below still remain on the credit report named, LUBA GONZALEZ, in violation of federal law. In the results of your investigations, you stated in writing that verified these items are being reported correctly; Who verified these accounts? How did they verify them? You still have not provided me with the name of the individual, business address, and telephone number of the person or business contacted during your re-investigation. You have not provided me a copy of any original documentation. Furthermore, you have failed to provide the method of verification as required under section 611(a)(7). Please be advised that under Section 611 (5)(A) of the FCRA - you are required to promptly delete all information which cannot be verified.

The Law is very clear as to the Civil liability and the remedy available to me (Section 616 & 617) if you fail to comply with Federal Law. I am a litigious consumer and I fully intend on pursuing litigation in this matter to enforce my rights under the FCRA.

In order to avoid legal action, I demand that you send me copies of the documents you used to verify the following accounts listed below or you delete them immediately. Please provide me with a copy of an updated and corrected credit report showing that these items have been deleted.

Also I am instructing you to delete all non-account holding inquiries over thirty(30) days old.

Name of Account

Account Number

Provide physical proof of verification

TD BANK USA CONNT

55105

585975210377.

un verified

(NELLSEARGO (AMDSVC 446547059002. 122 washing

WR- AMERICAN GENSOUS 57744 Z114090

ACTCORP OF SOUTHBAN W DISYLO.

MUNICEY

(ALVARY JORTHOHO SUL

EUS CLA

TOMB 200 TIMES AND

119 247 1850

117039/773

not wintig! nos worked

me withed

Impure, over 30 days old.

Thank you

FAQs ;

Track Another Package +

Tracking Number: 70201290000197571599

Remove >

Your item has been delivered to an agent for final delivery 2020 at 2:11 pm.

⊘ Delivered to Agent

September 9, 2020 at 2:11 pm Delivered to Agent for Final Delivery CHESTER, PA 19013

Get Updates ✓

| | U.S. Postal Service CERTIFIED MAIL® REC Domestic Mail Only | |
|---------|--|------------------|
| in H | For delivery information, visitiour website Chester 12PA 219016 | ak www.usps.cen |
| 72.57 | Carollied Mail Fee \$3.55 | 009. |
| 0007 | Extra Services & Fess (phech box, sed (as 83 act of part) Fesure Receipt (serdcapy) | Postmark Here |
| | Postage \$ \$0.55 Total Postage and Fees \$ \$4.10 | -09/03/202 |
| | Sent to The Young of Po Box No. Or PO Box No | |

Can't find what you're looking for?

See More ∨

Go to our FAQs section to find answers to your tracking questions.



Vilmington DE 1908

| Case 2:20-cv-02181-JCM-DJ | A Document 1-1 Filed 11/30 | 20 Page 28 of 28 |
|--|--|-----------------------------|
| JUSTICE COURT, LAS VEO | | · |
| LUBA GONZALEZ, AKA Luba Snow, Plaintiff (s) vs. TRANSUNION LLC, Defendant(s) | CASE NO.: 20C019817 Department No.: 04 SUMMONS | FOR COURT USE ONLY |

NOTICE: YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE ABOVE-NAMED DEFENDANT: You are hereby summoned and required to serve upon Plaintiff's attorney, whose address is set forth below, an Answer to the Complaint which is herewith served upon you, within 20 days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.²

- * If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following:
 - a. File with the Clerk of the Court, whose address is shown below, a formal written response (Answer) to the Complaint in accordance with the rules of the Court. A \$71.00 filing fee is required, or you must file an Application to Proceed *In Forma Pauperis* and request a waiver of the fee. (You may obtain forms and information at the Civil Law Self-Help Center located in the Regional Justice Center or at its website at http://www.civillawselfhelpcenter.org/.)
 - b. Serve a copy of your response upon the attorney whose name and address is shown below.
- * Unless you respond, your default will be entered upon application of the Plaintiff, and this Court may enter a judgment against you for the relief demanded, which could result in the taking of money or property or other relief.
- * If you intend to seek the advice of an attorney, you should do so promptly so that your response will be timely.

| GONZALEZ, LUBA | By: | of the | 10/28/2020 |
|----------------------------------|--------------------------|--------------|------------|
| 7260 SUNNY COUNTRYSIDE AVE LAS | DEPUTY CLERK | | Date |
| LAS VEGAS, NV 89179 | Justice Court, | | • |
| • | Las Vegas Township | AND I WHENCE | |
| | Regional Justice Center | | |
| Attorney Name, Address and Phone | 200 Lewis Avenue | | |
| | PO Box 552511 | | |
| • | Las Vegas, NV 89155-2511 | | |

APPROPRIATE COURTROOM ATTIRE AND SHOES ARE REQUIRED. NO SHORTS, HALTER TOPS, TANK TOPS, FOOD OR DRINK ARE PERMITTED.

¹ Notwithstanding the above, the State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members, and legislators, each have 45 days after service of this Summons within which to file an Answer to the Complaint.

² When service of the Summons is made by publication, the Summons shall, in addition to any special statutory requirements, also contain a brief statement of the object of the action substantially as follows: "This action is brought to recover a judgment for the sum of (indicate dollar amount), due and owing, " or as the case may be (JCRCP4(b)).